

February 19, 2020

Via ECF

The Honorable Barbara Moses
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20A
New York, NY 10007

Re: *In re Global Brokerage, Inc. f/k/a FXCM Inc. Securities Litigation*, Master File No. 1:17-cv-00916-RA-BCM

Dear Judge Moses,

Pursuant to this Court's February 4, 2020 Order the parties submit this joint status letter updating the Court on the progress of discovery to date.

Production of Documents

On February 10, 2020, Plaintiffs made an additional production of 40 documents on behalf of Lead Plaintiff 683 Capital Partners, LP ("683 Capital"), and on February 11, 2020, Plaintiffs produced an additional audio file on behalf of 683 Capital. Plaintiffs have informed Defendants that their document production on behalf of Plaintiffs is now substantially complete.

Defendants have produced nearly 8,000 documents thus far. Defendants are continuing their review of documents that hit on Plaintiffs' search terms and will continue to produce responsive documents on a rolling basis.

Interrogatories

On February 3, 2020, Plaintiffs served amended interrogatory responses on behalf of Named Plaintiff Sergey Regukh and Lead Plaintiff 683 Capital. On February 13, 2020, Plaintiffs served amended interrogatory responses on behalf of Lead Plaintiff Shipco Transport Inc. ("Shipco").

Depositions

As of yet, no depositions have taken place. The deposition of Plaintiffs' market efficiency expert, Dr. Adam Werner, is scheduled for February 28, 2020. The deposition of Named Plaintiff Sergey Regukh is scheduled for March 10, 2020, and the deposition of Lead Plaintiff 683 Capital is scheduled for March 19, 2020. Defendants are still awaiting available dates for the deposition of Lead Plaintiff Shipco.

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Case Schedule

Defendants' opposition to Plaintiffs' Class Certification Motion is currently due on March 6, 2020, and Plaintiffs' reply is due on April 20, 2020. Because Mr. Regukh and 683 Capital are not able to sit for their depositions until after the deadline for Defendants to file and serve their opposition brief, and because the parties have not yet been able to schedule the deposition of proposed Lead Plaintiff, Shipco, the parties have agreed to extend the deadlines for the class certification briefing and plan to submit a stipulation to the Court requesting this extension. The deadline for Defendants' opposition will be extended to April 3, 2020, and the deadline for Plaintiffs' reply to May 18, 2020. This proposed extension will not affect any other case deadlines. However, given that the deposition of Shipco has not yet been scheduled, Defendants reserve the right to seek an additional extension should it become necessary.

February 26 Status Conference

The parties respectfully request that the status conference scheduled for February 26, 2020, go forward but that it be changed to a phone conference.

Respectfully submitted,

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